

UNITED STATES DISTRICT COURT

for the

Western District of Texas

FILED

February 03, 2023

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America

v.

Alejandro GOMEZ

BY: Cecie Rodriguez

DEPUTY

Case No.

EP:23-MJ-334 ATBDefendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 31, 2023 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section*

21 U.S.C. § 846

*Offense Description*Knowingly Conspired to Posses with the Intent to Distribute
methamphetamine, to wit: approximately 503.2 grams of methamphetamine

This criminal complaint is based on these facts:

See attached statement of probable cause incorporated by reference herein.

☒ Continued on the attached sheet.Bobby Enriquez*Complainant's signature*Special Agent Bobby Enriquez, DEA*Printed name and title*

Sworn to before me and signed in my presence.

Date: _____

*Judge's signature*City and state: El Paso, TexasRobert F. Castañeda, U.S. Magistrate*Printed name and title*
JudgeComplaint sworn to telephonically on
February 03, 2023 at 1:29pm and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

AFFIDAVIT IN SUPPORT OF COMPLAINT

On January 31, 2023, members of the Drug Enforcement Administration (DEA) Texas Anti Gang (TAG) Unit and the El Paso County Sheriff's Office (EPSO) Narcotics Unit conducted a buy-walk operation for half a pound of methamphetamine for \$1,300. Following the operation, DEA agents executed a search warrant of a residence, which led to the seizure of more methamphetamine, as well as M30/fentanyl pills.

On January 31, 2023, an undercover (UC) agent contacted the CO-CONSPIRATOR and stated that he was ready to pick the CO-CONSPIRATOR up from his/her residence so that the CO-CONSPIRATOR could facilitate another methamphetamine buy from his/her source of supply. The UC picked up the CO-CONSPIRATOR from his/her residence and the UC and the CO-CONSPIRATOR drove to a residence in El Paso, TX, hereafter referred to as the PREMISES. The CO-CONSPIRATOR directed the UC to the rear of the PREMISES and the UC handed the CO-CONSPIRATOR \$650 in Official Advanced Funds, which were photographed prior to the drug buy, for the purchase of the methamphetamine. The CO-CONSPIRATOR directed the UC to drive to the front of the PREMISES and meet him/her there. The UC observed the CO-CONSPIRATOR entering into a rear door of the PREMISES and then drove around the block to the front of the PREMISES. Shortly thereafter, the CO-CONSPIRATOR exited the front door of the PREMISES and approached the UC and the UC vehicle. The CO-CONSPIRATOR handed the UC a clear plastic bag which contained a white crystalline substance and the UC handed The CO-CONSPIRATOR the remaining \$650 in OAF. The CO-CONSPIRATOR then returned, with the money, back into the PREMISES. The UC departed the area and transported the clear plastic bag of white crystalline substance to a secure location, where it was field tested and weighed. The substance tested positive for the properties of methamphetamine and had a gross weight of 213.5 grams.

Surveillance units noted a white BMW sedan, which is registered to Alejandro GOMEZ, parked in the rear area of the PREMISES. On January 31, 2023 at approximately 5:30 p.m., El Paso Police Department (EPPD), who was conducting surveillance of the PREMISES, executed a traffic stop of a vehicle seen leaving the PREMISES, and arrested Alejandro GOMEZ for possession of a stolen firearm. In GOMEZ' wallet, EPPD Officers discovered \$1,200. The serial numbers of each bill exactly matched the OAF used by DEA TAG to purchase 213.5 grams of methamphetamine earlier that day.

On January 31, 2023 at approximately 10:15 p.m., DEA TAG and EPSO Narcotics Unit executed a search warrant for the PREMISES. Agents seized drug packaging materials, three (3) scales, two (2) pipes with drug residue and a ledger notebook suggestive of drug distribution. In the rear bedroom, agents seized a clear plastic bag containing a white crystalline substance and a clear plastic bag containing blue pills with "M" and "30" markings. The clear plastic bag of a white crystalline substance was field tested and weighed. The substance tested positive for the properties of methamphetamine and had a gross weight of 289.7 grams. The bag of blue pills had a gross weight of 302.1 grams, however, due to the dangerous nature of fentanyl, agents no longer conduct field tests of fentanyl pills. Agents know, from training, experience and previous pill seizures, that the small blue pills, stamped with an M30 and sold in bulk without a prescription, are fake Oxycontin M30 pills, manufactured in Mexico with fentanyl.

EPSO Narcotics Detectives have two (2) arrest warrants for THE CO-CONSPIRATOR and will be taking THE CO-CONSPIRATOR into custody for his/her involvement in drug trafficking activities.

On February 1, 2023 agents contacted the owner of the PREMISES. The owner stated that the PREMISES is often listed for rent via AirBNB. The owner stated that the PREMISES was rented by Alejandro GOMEZ and provided an AirBNB account profile with a matching photograph for

GOMEZ. Furthermore, the owner of the PREMISES provided a telephone number for GOMEZ, which a subpoena return listed Alejandro GOMEZ as the registered user of the telephone number.

On February 2, 2023, agents read GOMEZ his Miranda Warning. GOMEZ agreed to speak with agents without an attorney present. GOMEZ stated that furthest rear bedroom, closest to the back door, was his bed room. GOMEZ also stated that all of the money in his wallet belonged to him and that he earned that money selling items on Facebook Marketplace. GOMEZ also stated that he sold "ice", a street term used to identify methamphetamine, to the CO-CONSPIRATOR on Tuesday (02/02/2023) and received \$600.

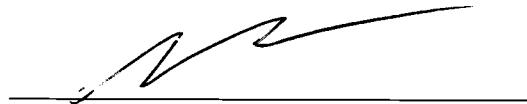


Bobby Enriquez

DEA SPECIAL AGENT

Sworn to before me this

3rd day of February of 2023



Robert F. Castañeda

UNITED STATES MAGISTRATE JUDGE
WESTERN DISTRICT OF TEXAS